

EXHIBIT Q

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21 ORACLE AMERICA, INC.

22 UNITED STATES DISTRICT COURT

23 NORTHERN DISTRICT OF CALIFORNIA

24 SAN FRANCISCO DIVISION

25 ORACLE AMERICA, INC.

Plaintiff,

26 v.

27 GOOGLE INC.

Defendant.

Case No. CV 10-03561 WHA

**PLAINTIFF'S REQUESTS FOR
PRODUCTION TO GOOGLE INC., SET
ELEVEN**

PLAINTIFF'S RFPs TO GOOGLE, SET
ELEVEN
CV 10-03561 WHA

1 each of “API Level 1” through “API Level 23” and including all constituent packages, classes,
 2 methods, constructors, fields, interfaces, errors, exceptions, enums, and annotation types of each
 3 such “API Level.”

4 10. “GOOGLE SERVICES” means applications, services, software, updates and
 5 functionality offered by Google to be deployed in connection with or used for development in
 6 connection with ANDROID devices or other device platforms, including but not limited to
 7 services called “Google Services,” “Google Mobile Services,” and “Google Play Services” and
 8 where such services may include, but are not limited to one or more of Gmail, Chrome, Google+,
 9 Google Maps, YouTube, Google Docs, Google Translate, Waze, Google Search, Google Talk,
 10 Google Hangouts, Google Play, Google Now on Tap, Android Market, and any software installed
 11 in WEARABLES, AUTOMOTIVE PRODUCTS, IOT DEVICES, Google at Work, Arc Welder,
 12 Brillo, or Weave, or other similar or related applications.

13 11. In directing these requests to GOOGLE, ORACLE seeks DOCUMENTS and
 14 tangible things available to GOOGLE, including those relating to companies GOOGLE has
 15 acquired (such as Android, Inc.) and parent companies (such as Alphabet, Inc.). These requests
 16 require YOU to produce those DOCUMENTS and tangible things that are in YOUR actual or
 17 constructive possession, custody, or control.

18 12. Wherever these requests seek information related to dynamic data (i.e., data
 19 regarding the number of ANDROID users or devices or data regarding financial projections and
 20 actuals), ORACLE seeks data for the finest frequency available.

21 **REQUESTS FOR PRODUCTION**

22 **REQUEST FOR PRODUCTION NO. 324**

23 Source code and DOCUMENTATION for all GOOGLE software that can be used to
 24 facilitate use of ANDROID (including software derived from ANDROID such as Brillo) on
 25 devices other than mobile phones, including by way of example and not limitation source code
 26 and documentation for Weave and source code and documentation for software related to porting
 27 ANDROID to desktop or laptop computers.
 28

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2 Dated: November 4, 2015

KAREN G. JOHNSON-MCKEWAN
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5
6 By: /s/ Lisa T. Simpson

Lisa T. Simpson
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ORACLE AMERICA, INC.

PROOF OF SERVICE

I am over the age of eighteen years and not a party to the within-entitled action. My business address is Orrick, Herrington & Sutcliffe LLP, 1000 Marsh Road, Menlo Park, CA 94025. On November 4, 2015, I served the following document:

**PLAINTIFF'S REQUESTS FOR PRODUCTION TO
GOOGLE INC., SET ELEVEN**

on the interested parties in this action by electronic service [Fed. Rule Civ. Proc. 5(b)] by electronically mailing a true and correct copy, pursuant to Google's counsel's email dated August 24, 2015, to the following listserv:

DALVIK-KVN@kvn.com

I declare under penalty of perjury under the laws of the State of California and the United States that the above is true and correct.

Executed on November 4, 2015 at Redwood City, California.

/s/Robert L. Uriarte
Robert L. Uriarte